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ILLINOIS COMMERCE COMMISSION

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| Mt. Carmel Public Utility Company | | Docket No. 01-0525 | CHIEF CLERK'S OFFICE |
|--------------------------------------------|---|--------------------|----------------------|
| Petition for approval of Residential |) | | |
| Delivery Services Implementation Plan |) | | |
| Pursuant to Section 16-105 of the Illinois |) | | |
| Public Utilities Act. |) | | |
| |) | | |

<u>PETITION TO INTERVENE</u>

Pursuant to 83 III. Admin. Code § 200.200, Illinois Power Company ("IPC") hereby petitions the Illinois Commerce Commission ("Commission") to be permitted to intervene as a party in the above-captioned proceeding. In support of its Petition, IPC states:

- 1. This docket relates to a request by Mt. Carmel Public Utility Company for the Commission to approve the Residential Delivery Services Implementation Plan Pursuant to Section 16-105 of the Illinois Public Utilities Act.
- 2. IPC is a combination gas and electric utility regulated by the Commission that, on June 1, 2001, also filed tariffs to implement residential delivery services and to otherwise revise its delivery services tariffs.
- 3. IPC may be affected by the decision of the Commission in this docket. Therefore, IPC wishes to participate in the proceeding and present its position on the issues raised by the parties.

4. IPC requests that the following be added to the service list in this proceeding:

Joseph L. Lakshmanan, Esq. Illinois Power Company 500 South 27th Street Decatur, IL 62521-2200 (217) 362-7449 (217) 362-7458 (facsimile)

Owen E. MacBride, Esq. Schiff Hardin & Waite 6600 Sears Tower Chicago, IL 60606 (312) 258-5680 (312) 258-5600 (facsimile)

WHEREFORE, Illinois Power Company requests that it be permitted to intervene and to be treated as a party to this proceeding pursuant to Section 200.200 of the Commission's Rules of Practice.

Respectfully submitted,

Joseph L. Lakshmanan, Esq.

Jacph L. Laksh

Illinois Power Company 500 South 27th Street

Decatur, IL 62521-2200

(217) 362-7449

(217) 362-7458 (facsimile)

Joseph Lakshmanan@illinoispower.com

Dated: August 7, 2001

VERIFICATION

I, Joseph L. Lakshmanan, being sworn on oath, states that the foregoing Petition to Intervene is true and accurate to the best of my knowledge, information and belief.

Joseph L. Lakshmanan

Subscribed and sworn to before me this $\int \frac{1}{1} day$ of August, 2001.

Notary Public

OFFICIAL SEAL LAURA A. KROHE NOTARY PUBLIC, STATE OF ILLINOIS MY COMMISSION EXPIRES 1-13-2002

CERTIFICATE OF SERVICE

I, Joseph L. Lakshmanan, certify that on the 7th day of August, 2001, I served a copy of Illinois Power Company's Petition to Intervene by first class mail, from Decatur, Illinois, postage prepaid to the individuals on the service list attached.

oseph L. Lakshmanan, Esq.

Service List Docket No. 01-0525

ERIC BRAMLET ATTY. FOR MT. CARMEL PUBLIC UTILITY CO. KOGER & BRAMLET, P.C. 316 ½ MARKET ST. PO BOX 278 MT. CARMEL, IL 62863